

**Speech-Language Pathology and Audiology Board**

1422 HOWE AVENUE, SUITE 3, SACRAMENTO, CA 95825-3204

TELEPHONE: (916) 263-2666/ FAX: (916) 263-2668

www.slpab.ca.gov

**SPEECH-LANGUAGE PATHOLOGY AND AUDIOLOGY BOARD
INITIAL STATEMENT OF REASONS**

Subject Matter of Proposed Regulations: Speech-Language Pathology Assistant/ Bachelor's Degree Applicants- Field Work Equivalency

Amend Section 1399.170.11 of Division 13.4 of Title 16

Specific Purpose of each adoption, amendment, or repeal:

The specific purpose of the proposed regulatory action is to amend the registration requirements for bachelor degree holders to qualify as speech-language pathology assistants (SLPAs). California Code of Regulation Section 1399.170.11 defines the requirements for individuals who hold a bachelor's degree in speech-language pathology or communications disorders to qualify for registration as an SLPA. The section further establishes that a bachelor's degree holder may apply the clinical experience earned in the undergraduate program to the requisite seventy (70) hours of field-work experience required for SLPA registration. Existing regulations require that such clinical hours be verified by the training program director of a board-approved SLPA program. This amendment would authorize the training program director of the undergraduate speech-language pathology and/or communication disorders program to verify such clinical hours.

In addition, this amendment proposes to establish a work experience equivalence wherein an applicant may apply actual work experience, that is, performing duties similar to that of an SLPA as established by law, (Business and Professions Code Section 2538.1), to the requisite 70 hours of clinical experience obtained by a bachelor's degree holder in a formal training program as is currently required in regulation. In this way, out-of-state applicants or applicants working in settings exempt from licensure, who were not provided formal clinical training in their respective undergraduate program, but who have completed one-year of full-time work experience performing duties consistent with an SLPA, may apply such experience to qualify for SLPA registration.

Factual Basis/Rationale

Factual basis for determination that each proposed change is necessary:

It is clear in the statute, Section 2538.3 that the course work required in a speech-language pathology or communication disorders bachelor's degree program is deemed "at least" equivalent to that of a speech-language pathology assistant associate's degree program. When the statute creating the new paraprofessional category of SLPA was passed (AB 205, Statutes of 1998), it was imperative that the requirements for the SLPA include a field work or clinical component in order that new paraprofessionals would be provided actual practical hands-on experience prior to being authorized to enter the workforce. As such, the SLPA

regulations defining the assistant training program standards were developed to include the completion of a minimum of seventy (70) hours of field work experience. Recently, amendments to the SLPA regulations (CCR Section 1399.170.11 (b)) have authorized the completion of equivalent clinical training from an undergraduate bachelor degree program as qualifying toward the SLPA registration requirements. However, such clinical hours must be evaluated or verified by the SLPA program director or designee. This has proven to be unnecessary and impractical. The training program directors of speech-language pathology undergraduate training programs are qualified to evaluate the undergraduate clinical experience and determine whether such experience would prepare an individual to serve as an SLPA under supervision. The additional step of transferring such clinical records to an SLPA training program director at another institution, who may not be as familiar, with the undergraduate clinical training sequencing, has proven burdensome and illogical. For this reason, the Board is proposing to amend existing regulations (CCR Section 1399.170.11(b)) to authorize verification of the clinical hours completed in a speech-language pathology or communication disorders undergraduate program to be verified by the undergraduate/graduate training program director.

As stated above, the professional community, employers, school organizations, and consumer groups involved in the creation of the SLPA category determined that a clinical standard or field-work experience component was an essential requirement for SLPA registration in California. Now, after almost six years of registering SLPAs in California, the knowledge of this employment demand and opportunity has spread to other states. In the last year, the Board has received inquiries from bachelor's degree holders both in California and out-of-state who have obtained considerable work-experience performing duties consistent to that of an SLPA in California, and would like to apply such experience toward the requisite field-work or clinical experience prescribed in existing SLPA regulations. Since the current provisions do not provide for an equivalent work experience standard, the Board can not issue an SLPA registration based on practical work experience. Given the existing critical shortage of speech-language pathology services in the state and the strong demand for additional services, the Board has determined that hands-on work experience equivalent to one-year of full-time employment performing the duties of an SLPA, as provided in Section 2538.1 of the Business and Professions Code, to be sufficient as an alternative standard to the prescribed formal clinical training. Such work experience would provide sufficient exposure to the clinical and administrative responsibilities of an SLPA and would adequately prepare a new SLPA registrant to meet the employment demands in the field of speech-language pathology. As such, the Board proposes an amendment to CCR Section 1399.170.11(b) to include subsection (3) authorizing the Board to consider work-experience as a qualifying standard for SLPA registration.

Underlying Data

Technical, theoretical or empirical studies or reports relied upon (if any): None

Business Impact

This regulation will not have a significant adverse economic impact on businesses.

Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives

No reasonable alternative to the regulation would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation.

Set forth below are the alternatives which were considered and the reasons each alternative was rejected:

To continue to require the SLPA training program director to verify clinical hours completed in an undergraduate speech-language pathology training program. This alternative was rejected because it is unnecessary and unduly burdensome for bachelor's degree applicants and SLPA training program directors. The training program directors of the undergraduate/graduate programs are most familiar with their own program components and are clearly qualified to evaluate a bachelor's degree candidate's clinical experience.

To continue to require that applicants for registration as SLPAs obtain their field-work or clinical experience from a formal training institution and, thereby, disregard actual work experience as a qualifying standard. This alternative was rejected as it creates barriers for potentially qualified and experienced individuals to work in California as registered SLPAs. This alternative does not strengthen the Board's consumer protection provisions, but rather disregards an appropriate and viable pathway to fortifying this much needed support personnel workforce.